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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Section 73.622(b)
Digital Television Table of Allotments
Muskogee, Oklahoma

MM Docket No. 99-____
RM-____

To: Chief, Allocations Branch

PETITION FOR RULE MAKING FOR PAIRED DTV CHANNEL

Tulsa Channel 19, LLC ("Tulsa Channel 19"), permittee of a newly operating analog television station KWBT(TV), (NTSC Channel 19), Muskogee, Oklahoma, by its attorneys and pursuant to Section 1.401 of the Commission's rules, hereby petitions the Commission to amend Section 73.622(b), its Digital Television Table of Allotments, to allocate Channel 20 as the paired digital television ("DTV") channel assigned to KWBT(TV) and to modify the license of KWBT(TV) accordingly.

INTRODUCTION

1. Tulsa Channel 19 became the permittee of NTSC Channel 19 at Muskogee, Oklahoma on August 27, 1998. The station is newly operational, having begun program test operations on September 12, 1999. KWBT(TV) is the only television station licensed to Muskogee. As an affiliate of the WB Network, KWBT(TV) is now able to provide Muskogee and the Tulsa area with this important source of new network programming. As a newly activated station, KWBT(TV) faces an arduous climb to full competitiveness in a market dominated by the major network affiliates. Compounding this lack of parity is the fact that KWBT(TV) is the only full service television station in the Tulsa market without a paired DTV

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channel. See Table V to the attached Engineering Statement. The stations with paired DTV channels will be able to maintain normal broadcast operations on their NTSC channel while they take the post-DTV construction steps necessary, over a period of weeks, and possibly months, to insure high quality, reliable DTV operations. However, KWBT(TV), with no paired DTV channel, will be forced to delay its rollout of DTV service to avoid the loss of audience so critical to a start up as well as to postpone the time when it will have to interrupt its NTSC operations when it begins to undergo the same quality/reliability DTV review and adjustment process. On its face, the public interest supports the granting of a paired DTV channel in those circumstances and there is no engineering or legal justification to the contrary.

DISCUSSION

2. At the time the Commission adopted the DTV Table of Allotments, KWBT(TV) did not receive a paired DTV channel because it was not among the group of stations that had received their initial authorizations by April 3, 1997.^{1/} For the reasons demonstrated more fully below, the Commission should now provide KWBT(TV) with a paired DTV channel.

3. As demonstrated by the attached Engineering Report, DTV Channel 20 can be allotted to KWBT(TV) for digital television operations using the station's authorized NTSC transmitter site, in full compliance with the applicable allotment criteria utilized by the FCC in generating the DTV Table of Allotments. Specifically, the allocation of DTV Channel 20 to Muskogee, Oklahoma at the KWBT(TV) site will permit coverage of the entire community of Muskogee with a 41 dBu contour. In addition, the allocation will not increase interference to more than an additional two percent (2%) of the population served by any other analog or DTV

^{1/} In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, Fifth Report and Order, FCC 97-116 at ¶ 17 n.26 (released April 21, 1997). ("Fifth Report and Order").

station. Nor will the allocation cause any analog or DTV station to receive interference to a total of 10% of its population served. See Engineering Report at pages 2 - 4.

4. In establishing the DTV Service, the Commission stated that its goal is to "promote and preserve free, universally available, local broadcast television in a digital world," and stressed that "DTV will also help ensure robust competition in the video market that will bring more choices at less cost to American consumers."^{2/} The allocation of a paired channel for KWBT(TV) is not only fully consistent with the Commission's stated goal, the failure to allocate a paired DTV channel to KWBT(TV) works at cross-purposes to that goal since it would likely delay the introduction of DTV service over KWBT(TV). Without a paired DTV channel, KWBT(TV) must convert its analog operation to digital operation using its current NTSC channel assignment, Channel 19. While the Commission has stated that its action in permitting stations such as KWBT(TV) to convert to DTV on their analog channels gives these stations the freedom to choose when, during the digital transition, to convert to DTV,^{3/} in reality, the Commission has given stations like KWBT(TV) no choice but to wait until the last possible moment to convert to avoid losing viewers with analog-only receivers as well as to delay the time when KWBT(TV)'s service to the public will be interrupted. In effect, this scheme is contrary to the Commission's objective of promoting the orderly and speedy roll out of competitive DTV service.

5. As the Commission is aware, the WB Network represents a significant

^{2/} Fifth Report and Order at ¶ 5.

^{3/} In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service. Second Memorandum Report and Order on Reconsideration of the Fifth and Sixth Report and Orders, FCC 98-315 at ¶ 20 (released December 18, 1998).

programming alternative to the established four networks. As a WB affiliate, KWBT(TV) is the only source of this programming service in the Tulsa market. By facilitating, rather than working against, an orderly and speedy transition to DTV, the Commission further incentivizes programmers, such as the WB Network, to produce digital programming well before the conversion to digital is complete. KWBT(TV) does not stand to gain any windfall from the allotment of Channel 20 as its DTV paired channel. As is true for all broadcasters with paired NTSC/DTV allotments, KWBT(TV) will have to build out and operate both channels at enormous expense and surrender one of the channels to the Commission upon the completion of the DTV transition.

6. To date, the Commission has offered two primary justifications for refusing to allot a paired DTV channel to stations such as KWBT(TV). Those justifications are either fallacious or inapplicable in the circumstances of this case. First, the Commission has stated that paired DTV channels were only granted to those broadcasters whose operations would be disrupted if they had to use their NTSC channel for DTV operations. The Commission reasoned that unbuilt stations did not require the second channel because they were not providing service to the public and therefore would not experience a disruption in service when converting to digital operations.^{4/} As noted, KWBT(TV) is now operational on NTSC Channel 19. KWBT(TV) has been advised by its engineers that, in order for the station to convert from analog to digital operation on Channel 19, the station will have to cease operations for a least some period of time. See Engineering Statement. Thus, the public will be deprived of service from KWBT(TV) to permit the station to complete the transition to high quality, reliable DTV service. Accordingly, if as the Commission has stated, avoidance of disruption of service is a

^{4/} Id. at ¶ 17.

public interest consideration, that same consideration applies now, and favors the assignment of a paired DTV channel for KWBT(TV).

7. The second reason advanced by the Commission for denying stations such as KWBT(TV) a paired DTV channel is that doing so may potentially reduce competition and diversity in broadcasting by depriving possible new entrants the opportunity to use such channels to start competitive DTV operations.^{5/} That is not a possibility here. KWBT(TV) is requesting Channel 20 as a paired channel for its DTV operation. The engineering analysis indicates that Channel 20 DTV operation from the authorized KWBT(TV) site with 200 kW ERP and 251 meters HAAT would not cause harmful interference to any analog TV or DTV stations or allotments exceeding the Commission's guidelines. This procedure is similar to the one used by the Commission in allotting paired DTV channels to other analog TV stations. An allotment for a new DTV channel which is not paired with an existing analog TV station requires compliance with the Commission's minimum distances to other TV stations as listed in Section 73.623(d) of its rules. Exhibit E-2 to the Engineering Statement shows the minimum separation arcs for the DTV allotment of Channel 20 near Muskogee, Oklahoma. Exhibit E-2 clearly indicates there is no fully-spaced area available near Muskogee where DTV Channel 20 can be allotted for the DTV operation of a new "stand alone" DTV station near Muskogee, Oklahoma. As such, DTV Channel 20 is already precluded by existing analog TV stations and DTV allotments for use by other potential applicants. Thus, while in other situations it may be appropriate to allow a channel like Channel 20 to lie fallow in the hopes that a new DTV broadcaster will make use of it, in this case there is no public interest basis in preventing Channel 20's utilization by the only party that can effectively use it to provide DTV service to the Muskogee.

^{5/} Id. at ¶ 18.

8. In light of this unique situation, the Commission should process this request in the same manner as it processes petitions for rulemaking involving mutually-exclusive higher class adjacent or co-channel FM license modifications pursuant to Section 1.420(g), or mutually-exclusive FM or TV community of license changes pursuant to Section 1.420(j). In these situations, the FCC has acknowledged that the requested modification can be granted without accepting or considering competing expressions of interest under the doctrine filed under Ashbacker Radio Corp. v. FCC.^{6/} With respect to mutually exclusive higher class adjacent or co-channel FM license modifications, the Commission has held that the newly allotted adjacent or co-channels sought were precluded by stations existing operations, and thus were not generally available for application. Accordingly, such modifications were not subject to competing applications.^{7/} With regard to mutually exclusive community of license changes, the Commission has stated: "The Commission can promulgate rules limiting eligibility to apply for a newly allotted channel when such action promotes the public interest, convenience and necessity."^{8/} The Commission found that the public interest, convenience and necessity was best served by permitting mutually exclusive community of license changes because doing so would permit stations to improve service to their audiences.^{9/}

9. The same factors pertain in the instant case. KWBT(TV) seeks the allotment of Channel 20 as its paired DTV channel which cannot be made generally available for application

^{6/} 326 U.S. 327 (1945).

^{7/} Amendment of the Commission's Rules Regarding Modification s of FM Broadcast Licenses to Higher Class Co-Channel or Adjacent Channels, 60 RR2d 114 (1986) at ¶ 17.

^{8/} Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989) at ¶ 23.

^{9/} Id. at ¶ 24.

by anyone other than KWBT(TV). Permitting KWBT(TV) to modify its license to specify Channel 20 as its paired DTV channel will bring substantial public service benefits which cannot be realized in any other way. While Congress has indicated that the Commission should limit the "initial eligibility" for DTV paired channels to then existing broadcasters,^{10/} without accepting competing applications for those channels,^{11/} the Congress did not preclude the Commission, after the initial issuance nationally of DTV licenses, from determining that the public interest, convenience and necessity could also require the modification of licenses of certain of those persons who became broadcasters subsequent to the initial establishment of the DTV Table of Allotments. This license modification approach is precisely what the Commission has used in ruling that pending NTSC applicants are eligible to convert to DTV operation on their analog channels, rather than concluding that their channels must be reclaimed and auctioned for DTV use. While the Commission has declined, as a general rule, to extend eligibility for a paired channel to pending NTSC applicants, the Commission has the affirmative duty to closely examine where the public interest leads it in each particular case and to pursue the public interest. Significant public service benefits will obtain if the Commission allots a paired DTV channel to KWBT(TV) in the unique circumstances presented here. Thus, the Commission should conclude that KWBT(TV) is eligible for a paired DTV channel because Channel 20 is not available for general application and the public would benefit from KWBT(TV)'s earlier provision of digital service on that channel during the digital television transition period.

10. Neither the auction provisions of the Communications Act of 1934, as amended, (the "Act"), nor the Commission's rules and regulations promulgated pursuant thereto, bar the

^{10/} See 47 U.S.C. § 336(a)(1).

^{11/} See 47 U.S.C. § 309(j)(2)(B).

Commission from taking this action. First, the Commission is not required, and indeed has not the authority, to apply the competitive bidding process in this circumstance. Section 309(j) only applies when mutually exclusive applications are accepted for an initial license or construction permit. In the instant case, no mutually exclusive applications would be involved. This is an allotment proceeding, not an initial license or construction permit proceeding. Accordingly, Section 309(j) of the Act does not even apply. Second, even if Section 309(j) did apply, the Act cautions that nothing in spectrum allocation criteria and procedures (§309(j)(6)(A)) is to be construed to relieve the Commission of its obligation in the public interest to continue to use engineering solutions, threshold qualifications and other means to avoid mutual exclusivity in application and licensing proceedings (§309(j)(6)(E)). Lastly, the Commission is expressly precluded from basing any finding of public interest, convenience and necessity on any expectation of Federal revenues from the use of a system of competitive bidding. (§309(j)(7)(A)).

11. These statutory directives not only permit but dictate the action requested of the Commission in this Petition. As stressed, this is a spectrum allocation proceeding, not an initial licensing or construction permit proceeding. Accordingly, the criteria and procedures the Commission uses in this type of proceeding is peremptory. In addition, by following the Section 1.420(i) procedure here, the Commission will have complied with the Congressional directive that it use various means to avoid mutual exclusivities in the application and licensing process. Lastly, since the Commission is precluded from considering whether and how much Federal revenue it might gain from allowing interested parties to bid for DTV Channel 20, that is not a lawful consideration.

12. If the Commission allocates the channel as requested herein, Tulsa Channel 19 will promptly file the appropriate modification application to specify DTV operation on Channel 20 at Muskogee, Oklahoma.

CONCLUSION

For the foregoing reasons, Tulsa Channel 19, LLC respectfully requests the Commission to allocate Channel 20 at Muskogee, Oklahoma as the digital paired channel for KWBT(TV) and to modify the license of KWBT(TV) accordingly.

Respectfully submitted,

TULSA CHANNEL 19, LLC

By: 

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Dated: September 17, 1999

**ENGINEERING STATEMENT RE
REQUEST FOR A DTV CHANNEL ALLOTMENT
TO PAIR WITH ANALOG NTSC TV STATION
KWBT, MUSKOGEE, OKLAHOMA**

SEPTEMBER 1999

**COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.**

City of Washington)
) ss
District of Columbia)

That he is a registered professional engineer in the District of Columbia, holds the degree of Master of Science in Electrical Engineering, and is Secretary-Treasurer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio-Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That the attached engineering report was prepared by him or under his supervision and direction; and

S. K. Khoury

Sudhir K. Khanna
District of Columbia
Professional Engineer
Registration No. 8057

Subscribed and sworn to before me this 17th day of September, 1999.


Notary Public

My Commission Expires:

2/28/2003

Introduction

This engineering report has been prepared on behalf of Tulsa Channel 19, LLC, permittee of a new analog NTSC TV station KWBT, Muskogee, Oklahoma in support of its request for a paired channel for its digital television (DTV) operation.

Station KWBT(TV)'s authorized analog NTSC operation is on Channel 19 (500-506 MHz) with 5000 kW effective radiated power (ERP) and 251 meters antenna height above average terrain (HAAT) using a non-directional TV antenna. The KWBT(TV) transmitter site is located approximately 3.2 km east-northeast of Bald Hill in Okmulgee County, Oklahoma at the following geographic coordinates.

North Latitude: 35° 45' 08"

West Longitude: 95° 48' 15"

It is proposed to amend Section 73.622 of the Commission's rules, Digital Television Table of Allotment, to allot Channel 20 (506-512 MHz) for the digital television operation of KWBT at Muskogee, Oklahoma. As demonstrated below the proposed Channel 20 DTV operation at Muskogee would not cause any harmful interference to any other analog NTSC or DTV stations or allotments exceeding the Commission's guidelines.

The proposed DTV Channel 20 can operate from the authorized KWBT antenna site with 200 kW non-directional ERP and 251 meters HAAT without adversely impacting other TV operations. The proposed DTV facilities would closely replicate the Grade B (64 dBu) contour of the associated Channel 19 analog NTSC service area. In addition, the proposed Channel 20

DTV operation would serve all of Muskogee, Oklahoma with 41 dBu contour as shown on the attached Exhibit E-1.

Analog NTSC TV Allocation Situation

The attached Table I shows the pertinent nearest co-channel analog NTSC TV stations within 450 km and adjacent channel operations within 250 km of the authorized KWBT DTV antenna site. None of these TV stations were granted after April 3, 1997 with different facilities than licensed now. Therefore, their impact on other analog NTSC TV stations and DTV allotments has been accounted for in the baseline populations figure listed in Appendix B of the Commission's Sixth Report and Order.

An electromagnetic interference study has been conducted to determine any potential interference to other analog NTSC TV stations from the proposed Channel 20 DTV operation according to the procedure described in OET Bulletin 69. For this study, the HDTV computer program developed by the NTIA at Boulder, Colorado was used which provides similar results to the Commission's Longley-Rice computer model. The attached Table II shows the population which may be potentially impacted by the proposed Channel 20 DTV operation. Table II indicates the proposed Channel 20 DTV operation would not result in more than 2% interference to any analog NTSC TV stations nor would it cause any station to receive overall interference within its Grade B contour which would be 10% or more of its baseline population. Therefore, the potential interference population will not exceed the Commission's guidelines provided in its Public Notice dated August 10, 1998 (Additional Application Processing Guidelines for Digital Television (DTV)).

DTV Allocation Situation

The attached Table III shows the pertinent nearest co-channel DTV allotments within 450 km and adjacent channel DTV allotments or stations within 250 km of the authorized KWBT DTV antenna site. None of the DTV stations shown in Table III has been granted as a non-check list proposal nor do their proposed DTV operations extend the signal in any direction beyond the allotted facilities. Therefore, their impact on other analog NTSC TV stations and DTV allotments has already been taken into account in the baseline populations figure listed in Appendix B of the Commission's Sixth Report and Order.

An electromagnetic interference study has been conducted to determine any potential interference caused to other DTV allotments or authorized stations from the proposed Channel 20 DTV operation according to the procedure described in OET Bulletin 69. For this study also, the HDTV computer program developed by the NTIA at Boulder, Colorado was used. The attached Table IV shows the population which may be potentially impacted by the proposed Channel 20 DTV operations. Table IV indicates the proposed Channel 20 DTV operation would not result in more than 2% interference to any DTV allotment or stations nor it would cause any station to receive overall 10% or more interference. Therefore, the potential interference population will not exceed the Commission's guidelines provided in its Public Notice dated August 10, 1998 (Additional Application Processing Guidelines for Digital Television (DTV)).

The above analysis demonstrates DTV Channel 20 can be allotted at Muskogee, Oklahoma to be paired with analog NTSC TV operation of KWBT on channel 19 without impacting other analog NTSC and DTV stations and allotments.

Public Interest Reasons for a Paired DTV Channel

The licensed community of KWBT, Muskogee, Oklahoma is part of the Tulsa TV market. There are currently ten stations, including KWBT, which provide TV service to this market. The attached Table V shows the analog TV and DTV channel allotments for each TV station. Every TV station in the Tulsa market has been allotted an additional channel for its DTV operation except KWBT. If no DTV channel is allotted to KWBT, it would leave the station at a competitively disadvantageous position with respect to other TV stations in the market.

It is expected that KWBT will be operating in the analog TV mode for several years until there are sufficient households with DTV receivers which would justify switching to the digital operation or sooner if mandated by the Commission. In the absence of an additional TV channel KWBT will have no option but to turn off its analog TV operation to start in the digital mode on its current Channel 19. Station KWBT may have to stay off-the-air for several days or even weeks so that the appropriate equipment can be installed for the digital operation and a high quality, reliable signal can be assured. Furthermore, a reliable digital operation may not be possible for considerable time until the station personnel gain experience with the new technology. During such period, the community of Muskogee would be left without a local TV service. KWBT is the only TV station authorized to Muskogee, Oklahoma. There are no other analog TV or DTV channels available for additional TV stations at Muskogee. Station KWBT believes if it is allotted Channel 20 for its digital TV operation it will enable the station to continue providing service to its licensed community without any interruption.

Station KWBT is requesting Channel 20 as a paired channel for its DTV operation. The above engineering analysis indicates Channel 20 DTV operation from the authorized KWBT site with 200 kW ERP and 251 meters HAAT would not cause harmful interference to any analog TV or DTV stations or allotments exceeding the Commission's guidelines. This procedure is similar to the one used by the Commission in allotting paired DTV channels to other analog TV stations. An allotment for a new DTV channel which is not paired with an existing analog TV station requires compliance with the Commission's minimum distances to other TV stations as listed in Section 73.623(d) of its rules. The attached Exhibit E-2 shows the minimum separation arcs for the allotment of DTV Channel 20 near Muskogee, Oklahoma. Exhibit E-2 clearly indicates there is no fully-spaced area available near Muskogee where DTV Channel 20 site can be located to meet the Commission's rules. Therefore, Channel 20 cannot be allotted for the DTV operation of a new "stand alone" DTV station near Muskogee, Oklahoma. As such, DTV Channel 20 is already precluded by existing analog TV stations and DTV allotments for use by other potential applicants.

Based on the reasons stated above, Tulsa Channel 19, LLC requests the Commission to allot Channel 20 to KWBT for its DTV operation with 200 kW ERP and 251 meters HAAT. If the Commission determines that its computer model indicates lesser facilities than proposed herein, the applicant would be willing to accept such facilities for the proposed Channel 20 DTV allotment.

COHEN, DIPPELL AND EVERIST, P. C.

TABLE I
ANALOG NTSC TV ALLOCATION
FOR THE PROPOSED CHANNEL 20 DTV OPERATION OF
KWBT, MUSKOGEE, OKLAHOMA
SEPTEMBER 1999

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>ERP</u> kW	<u>HAAT</u> meters	<u>Distance</u> <u>from KWBT</u> km
20	KWBT-DT Prop.	Muskogee, OK	200	251	--
16	None within 150 km				
17	KDOR	Bartlesville, OK	3980	316	84.8
18	None within 150 km				
19	KWBT	Muskogee, OK	5000	251	--
20	KAFU	Enid, OK	141	136	204.9
21	KOZK	Springfield, OK	1410	546	303.2
22	None within 150 km				
23	KOKI	Tulsa, OK	3310	399	32.5
24	None within 150 km				
27	None within 150 km				
28	None within 150 km				

COHEN, DIPPELL AND EVERIST, P. C.

TABLE II
ANALOG NTSC TV STATIONS
THAT MAY BE IMPACTED
FROM THE PROPOSED CHANNEL 20 DTV OPERATION OF
KWBT, MUSKOGEE, OKLAHOMA
SEPTEMBER 1999

<u>Station</u>	Potential Interference <u>Population</u> 1990 Census	<u>Baseline</u> <u>Population</u>	Percent of NL <u>Population</u>	Percent of Baseline <u>Population</u>
KDOR	257	782,000	0.0	0.03
KAFU	21	71,000	0.0	0.03
KOKI-TV	6	988,000	0.3	<0.01

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TABLE III
DTV ALLOCATION SITUATION
FOR THE PROPOSED CHANNEL 20 DTV OPERATION OF
KWBT, MUSKOGEE, OKLAHOMA
SEPTEMBER 1999

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>ERP</u> kW	<u>HAAT</u> meters	<u>Distance</u> <u>from KWBT</u> km
20	KWBT-DT Prop.	Muskogee, OK	200	251	--
19	KTVT-DT CP	Fort Worth, TX	565	500	367.6
20	KXII Allot.	Sherman, TX	394	543	211.4
21	KHBS Allot.	Fort Smith, AR	77.8	610	127.1

TABLE IV
DTV STATIONS THAT MAY BE IMPACTED
FROM THE PROPOSED CHANNEL 20 DTV OPERATION OF
KWBT, MUSKOGEE, OKLAHOMA
SEPTEMBER 1999

<u>Station</u>	Potential Interference <u>Population</u> 1990 Census	<u>Baseline</u> <u>Population</u>	Percent of <u>Baseline</u> <u>Population</u>
KHBS-DT	260	310,000 (290,000)	0.08
KXII-DT	4,217	684,000 (384,000)	0.62

() Associated analog NTSC station population.

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TABLE V
LIST OF STATIONS PROVIDING TV SERVICE TO THE
TULSA, OKLAHOMA MARKET
SEPTEMBER 1999

<u>Call</u>	<u>Licensed Community</u>	<u>Analog Channel</u>	<u>Allotted DTV Channel</u>
KJRH	Tulsa, OK	2	56
KOTV	Tulsa, OK	6	55
KTUL	Tulsa, OK	8	58
KDOR	Bartlesville, OK	17	15
KOKI-TV	Tulsa, OK	23	22
KTFO	Tulsa, OK	41	42
KTPX	Okmulgee, OK	44	28
KWHB	Tulsa, OK	47	48
KWMJ	Tulsa, OK	53	49
KWBT	Muskogee, OK	19	none



